

Judge Martha M. Pacold
Magistrate Judge Gabriel A. Fuentes
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

FILED

MO-1 DEC 12 2022

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

UNITED STATES OF AMERICA

)

) No.

)

v.

)

) Violations: Title 18, United States

) Code, Section 1344; Title 26, United

CHANSONY SIN

) States Code, Section 7206(1)

COUNT ONE

The SPECIAL MAY 2022 GRAND JURY charges:

1. At times material to this Indictment:

a. Defendant CHANSONY SIN was a resident of the Northern District of Illinois and worked in an administrative capacity at various dental offices located within the district. Defendant's job responsibilities at these dental offices included working with patients' insurance companies, handling items of payment made by those insurance companies as reimbursement for dental services, and recording and maintaining information related to those insurance payments for the dental offices.

b. Dental Offices A, B, and C were dental service businesses located in the Northern District of Illinois and accepted payment from insurance companies as reimbursement for dental services provided to patients. The insurance companies made these payments by, among other methods, sending checks to the dental offices drawn upon accounts maintained at various financial institutions, including Bank of

America, Citibank, N.A., M.B. Financial Bank, and Wells Fargo, N.A., the deposits of which were insured by the Federal Deposit Insurance Corporation.

c. Defendant CHANSONY SIN maintained personal banking accounts at financial institutions, including Citibank, N.A. and PNC Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

2. Beginning no later than in or about April 2016, and continuing through in or about July 2020, in the Northern District of Illinois, Eastern Division, and elsewhere,

CHANSONY SIN,

defendant herein, knowingly devised and participated in a scheme to defraud and to obtain money and funds owned by and under the custody and control of a financial institution, by means of materially false and fraudulent pretenses, representations, and promises, which scheme is further described in the following paragraphs.

3. It was part of the scheme that defendant CHANSONY SIN stole insurance company checks totaling over \$300,000 made payable to Dental Offices A, B, and C, or individual dentists affiliated with those offices, as reimbursement for dental services provided to patients insured by those insurance companies.

4. It was further part of the scheme that defendant CHANSONY SIN forged the endorsement of the dental offices and individual dentists on the checks that she stole from Dental Offices A, B, and C.

5. It was further part of the scheme that, after fraudulently forging the endorsement of the payees on the stolen insurance company checks, defendant

CHANSONY SIN deposited and caused the deposit of the stolen checks into her personal bank accounts at Citibank and PNC Bank.

6. It was further part of the scheme that defendant CHANSONY SIN obtained over \$300,000 from financial institutions as a result of her scheme and used the proceeds for her own personal purposes.

7. It was further part of the scheme that, in order to conceal her scheme, defendant CHANSONY SIN destroyed records at the dental offices related to the services covered by the insurance payments she embezzled from the offices, including records of dental treatment.

8. It was further part of the scheme that defendant CHANSONY SIN concealed, misrepresented and hid, and caused to be concealed, misrepresented, and hidden, the existence of the scheme, the purposes of the scheme, and the acts done in furtherance of the scheme.

9. On or about June 30, 2018, in the Northern District of Illinois, Eastern Division, and elsewhere,

CHANSONY SIN,

defendant herein, knowingly executed and attempted to execute the scheme by forging the endorsement of Dental Office A on an insurance check made payable to that office in the amount of \$2,138.60 and depositing the check into her account at Citibank;

In violation of Title 18, United States Code, Section 1344.

COUNT TWO

The SPECIAL MAY 2022 GRAND JURY further charges:

1. The allegations of paragraphs one through eight of Count One are incorporated here.

2. On or about October 29, 2018, in the Northern District of Illinois, Eastern Division, and elsewhere,

CHANSONY SIN,

defendant herein, knowingly executed and attempted to execute the scheme by forging the endorsement of Dental Office A on an insurance check made payable to that office in the amount of \$1,932.80 and depositing the check into her account at Citibank;

In violation of Title 18, United States Code, Section 1344.

COUNT THREE

The SPECIAL MAY 2022 GRAND JURY further charges:

1. The allegations of paragraphs one through eight of Count One are incorporated here.

2. On or about January 31, 2019, in the Northern District of Illinois, Eastern Division, and elsewhere,

CHANSOY SIN,

defendant herein, knowingly executed and attempted to execute the scheme by forging the endorsement of Dental Office A on an insurance check made payable to that office in the amount of \$1,665.00 and depositing the check into her account at Citibank;

In violation of Title 18, United States Code, Section 1344.

COUNT FOUR

The SPECIAL MAY 2022 GRAND JURY further charges:

1. The allegations of paragraphs one through eight of Count One are incorporated here.

2. On or about December 3, 2019, in the Northern District of Illinois, Eastern Division, and elsewhere,

CHANSONY SIN,

defendant herein, knowingly executed and attempted to execute the scheme by forging the endorsement of Dental Office B on an insurance check made payable to that office in the amount of \$2,689.17 and depositing the check into her account at Citibank;

In violation of Title 18, United States Code, Section 1344.

COUNT FIVE

The SPECIAL MAY 2022 GRAND JURY further charges:

1. The allegations of paragraphs one through eight of Count One are incorporated here.

2. On or about June 23, 2020, in the Northern District of Illinois, Eastern Division, and elsewhere,

CHANSONY SIN,

defendant herein, knowingly executed and attempted to execute the scheme by forging the endorsement of a dentist affiliated with Dental Office C on an insurance check made payable to that dentist in the amount of \$386.00 and depositing the check into her account at PNC Bank;

In violation of Title 18, United States Code, Section 1344.

COUNT SIX

The SPECIAL MAY 2022 GRAND JURY further charges:

1. The allegations of paragraphs one through eight of Count One are incorporated here.

2. On or about July 8, 2020, in the Northern District of Illinois, Eastern Division, and elsewhere,

CHANSONY SIN,

defendant herein, knowingly executed and attempted to execute the scheme by forging the endorsement of Dental Office B on an insurance check made payable to that office in the amount of \$2,109.14 and depositing the check into her bank account at PNC Bank;

In violation of Title 18, United States Code, Section 1344.

COUNT SEVEN

The SPECIAL MAY 2022 GRAND JURY further charges:

On or about February 6, 2017, in the Northern District of Illinois, Eastern Division, and elsewhere,

CHANSOY SIN,

defendant herein, willfully made and subscribed, and caused to be made and subscribed, a U.S. Individual Income Tax Return (Form 1040A with schedules and attachments), for the calendar year 2016, which return was verified by written declaration that it was made under penalties of perjury and was filed with the Internal Revenue Service, which return she did not believe to be true and correct as to every material matter, in that the return stated that it and the accompanying schedules and statements “accurately list all amounts and sources of income” that defendant received during the year, when defendant knew that the return did not list the amount or source of all of her income;

In violation of Title 26, United States Code, Section 7206(1).

COUNT EIGHT

The SPECIAL MAY 2022 GRAND JURY further charges:

On or about February 12, 2018, in the Northern District of Illinois, Eastern Division, and elsewhere,

CHANSOY SIN,

defendant herein, willfully made and subscribed, and caused to be made and subscribed, a U.S. Individual Income Tax Return (Form 1040A with schedules and attachments), for the 2017 calendar year, which return was verified by written declaration that it was made under penalties of perjury and was filed with the Internal Revenue Service, which return she did not believe to be true and correct as to every material matter, in that the return stated that it and the accompanying schedules and statements “accurately list all amounts and sources of income” that defendant received during the year, when defendant knew that the return did not list the amount or source of all of her income;

In violation of Title 26, United States Code, Section 7206(1).

COUNT NINE

The SPECIAL MAY 2022 GRAND JURY further charges:

On or about January 28, 2019, in the Northern District of Illinois, Eastern Division, and elsewhere,

CHANSONY SIN,

defendant herein, willfully made and subscribed, and caused to be made and subscribed, a U.S. Individual Income Tax Return (Form 1040 with schedules and attachments), for the 2018 calendar year, which return was verified by written declaration that it was made under penalties of perjury and was filed with the Internal Revenue Service, which return she did not believe to be true and correct as to every material matter, in that the return reported on Line 6 that her total income was \$46,223, when defendant knew that her total income substantially exceeded that amount;

In violation of Title 26, United States Code, Section 7206(1).

COUNT TEN

The SPECIAL MAY 2022 GRAND JURY further charges:

On or about January 29, 2020, in the Northern District of Illinois, Eastern Division, and elsewhere,

CHANSONY SIN,

defendant herein, willfully made and subscribed, and caused to be made and subscribed, a U.S. Individual Income Tax Return (Form 1040 with schedules and attachments), for the 2019 calendar year, which return was verified by written declaration that it was made under penalties of perjury and was filed with the Internal Revenue Service, which return she did not believe to be true and correct as to every material matter, in that the return reported on Line 7b that her total income was \$41,575, when defendant knew that her total income substantially exceeded that amount;

In violation of Title 26, United States Code, Section 7206(1).

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY